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Attorneys for Plaintiff /  
Counterclaim-Defendant Audrey Davis

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Audrey Davis,  
Plaintiff /  
Counterclaim-Defendant,

v.

Rhondie Voorhees,  
Defendant /  
Counterclaim-Plaintiff,

and,

ERAU College Board of Trustees; ERAU;  
and Tyler Smith,  
Defendants.

Case No. 3:21-cv-08249-DLR

**STIPULATION TO EXTEND TIME  
FOR PLAINTIFF'S REPLIES IN  
SUPPORT OF MOTION TO  
DISMISS COUNTERCLAIM AND  
MOTION FOR RULE 41(d) COSTS  
AND STAY OF PROCEEDINGS ON  
COUNTERCLAIM**

**(First Request)**

Plaintiff Audrey Davis and Defendant Rhondie Voorhees, by and through their attorneys of record, hereby stipulate, subject to this Court's approval, to extend the date by which Ms. Davis may file her replies in support of her motion to dismiss Defendant Rhondie Voorhees's Counterclaim and her motion for Rule 41(d) costs and stay of proceedings on the counterclaim from January 18, 2022, to January 25, 2022. This is the first request for an extension of time to file replies in support of these motions.

1           There is good cause to extend Ms. Davis's time to file her replies because her lead  
2 counsel, Attorney Marc Randazza, is currently ill and has been home for several days,  
3 preventing him from effectively working on the replies. The parties agree that granting Ms.  
4 Davis an extension until January 25, 2022 will allow her counsel sufficient time to prepare  
5 the replies.

6  
7  
8 /s/ Daniel R. Warner

Daniel R. Warner, Esq.

RM Warner, PLC

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Suite 229

Scottsdale, Arizona 85258

Attorneys for Defendant Rhondie  
Voorhees

/s/ Marc J. Randazza

Marc J. Randazza

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Attorneys for Plaintiff Audrey Davis

14  
15 IT IS SO ORDERED:

16  
17 \_\_\_\_\_  
18 UNITED STATES DISTRICT JUDGE

19 DATED: \_\_\_\_\_  
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Case No. 3:21-cv-08249-DLR

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18<sup>th</sup> day of January 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Marc J. Randazza  
Randazza Legal Group, PLLC

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